

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRAVELERS INDEMNITY COMPANY,
TRAVELERS INDEMNITY COMPANY OF
CONNECTICUT, formerly known as
TRAVELERS INDEMNITY COMPANY OF
RHODE ISLAND, TRAVELERS CASUALTY AND
SURETY COMPANY, formerly known as
THE AETNA CASUALTY AND SURETY
COMPANY, AND TRAVELERS PROPERTY
CASUALTY COMPANY OF AMERICA,
formerly known as TRAVELERS INDEMNITY
COMPANY OF ILLINOIS,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION,
NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants,

and

CENTURY INDEMNITY COMPANY, eventual
successor in interest to INSURANCE COMPANY
OF NORTH AMERICA,

Nominal Defendant.

12-CV-03040 (KBF)(FM)

**DECLARATION OF
JOHN F. SCANLON
FILED UNDER SEAL**

ECF CASE

I, John F. Scanlon, declare as follows pursuant to 28 U.S.C. § 1746:

I am an attorney at the law firm of Covington & Burling LLP, counsel to Defendant Northrop Grumman Corporation and Defendant and Counterclaim/Crossclaim-Plaintiff Northrop Grumman Systems Corporation (collectively, “Northrop Grumman”). I am presenting the attached exhibits in support of Northrop Grumman’s Opposition to Travelers’ Motion for Partial Summary Judgment “That Certain Policies Contain the New York Statutory Pollution

Exclusion” for public filing. My declaration containing the full set of exhibits is to be filed under seal of the Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on February 1, 2013 in Washington, DC.

s/ John F. Scanlon
John F. Scanlon